

FILED

MAY 11 2016

U. S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES OF AMERICA,)
Plaintiff,)
v.)
MARC A. MANZO,)
Defendant.)

4:16CR00201 ERW/SPM

INDICTMENT

COUNT I

The Grand Jury charges that:

At all times pertinent to the charges in this indictment:

1. Federal law defined the term:

- (a) "minor" to mean any person under the age of eighteen years (18 U.S.C. § 2256(a));
- (b) "sexually explicit conduct" to mean actual or simulated
 - (i) sexual intercourse, including genital-genital, oral-genital, anal-genital, or oral-anal, whether between persons of the same or opposite sex,
 - (ii) bestiality,
 - (iii) masturbation,
 - (iv) sadistic or masochistic abuse, or

- (v) lascivious exhibition of the genitals or pubic area of any person (18 U.S.C. §2256(2)(A)); and
- (c) "computer" to mean an electronic, magnetic, optical, electrochemical or other high speed data processing device performing logical, arithmetic or storage functions, including any data storage facility or communications facility directly related to or operating in conjunction with such device. (18 U.S.C. §2256(6));
- (d) "child pornography" to mean any visual depiction, including any photograph, film, video, picture, or computer or computer-generated image or picture, whether made or produced by electronic, mechanical, or other means, of sexually explicit conduct, where--
 - (A) the production of such visual depiction involves the use of a minor engaging in sexually explicit conduct; or
 - (C) such visual depiction has been created, adapted, or modified to appear that an identifiable minor is engaging in sexually explicit conduct (18 U.S.C. §2256(8)).

2. The "Internet" was, and is, a computer communications network using interstate and foreign lines to transmit data streams, including data streams used to store, transfer and receive graphic files.

3. Between, on or about November 18, 2014, and on or about September 1, 2015, in the Eastern District of Missouri, and elsewhere,

Marc A. Manzo,

the defendant herein, did knowingly receive images and videos of child pornography over the

internet, a means or facility of interstate commerce, and these images and videos were visual depictions that involved the use of a minor engaging in sexually explicit conduct and such visual depictions were of a minor engaging in sexually explicit conduct, including but not limited to the following:

- 1) "973.part.met" – a graphic video file of a male attempting to penetrate the genitals of a prepubescent minor female;
- 2) "928.part.met" – a graphic video file depicting a minor prepubescent female penetrating herself with an object while a male puts his erect penis near her face;
- 3) "276.part.met" – a graphic video file depicting a minor prepubescent female in a lascivious display of her genitals;
- 4) "2012 Lili 15 Show Asshole & Body Nude Webcam (Expuntitos).avi" – a graphic video file of a minor female lasciviously displaying her genitals;
- 5) "084.part" – a graphic video file of a prepubescent minor female in a lascivious display.

In violation of Title 18, United States Code, Section 2252A(a)(2).

COUNT II

The Grand Jury further charges that:

1. The allegations contained in paragraphs one and two of Count I of this Indictment are incorporated by reference as if fully set forth herein.
2. Between, on or about November 18, 2014, and on or about September 1, 2015, in the Eastern District of Missouri, and elsewhere,

Marc A. Manzo,

the defendant herein, did knowingly possess material that contains an image and video of child pornography that was produced using materials that traveled in interstate and foreign commerce,

to wit, a Seagate 2 TB external hard drive that was produced outside of Missouri and therefore has traveled in interstate and foreign commerce, and said hard drive contained child pornography, including but not limited to the following:

- 1) "2015 Tropical-Cuties Adry Deli Fuck & Les.avi" – a graphic video file of a male having sex with a minor prepubescent female;
- 2) "(Opva) 2014_02_TLZ_Monica NS(L0)_x264.mp4" – a graphic video file of a prepubescent minor female performing oral sex on a male;
- 3) "090 zzzz tlz (~center~)(opva)(2013) 7 APRIL hj bj finger pencil in ass vib cum.avi" – a graphic image file of a prepubescent minor female in a lascivious display of her genitals.

In violation of Title 18, United States Code, Section 2252A(a)(5)(B).

COUNT III

The Grand Jury further charges that:

1. The allegations contained in paragraphs one and two of Count I of this Indictment are incorporated by reference as if fully set forth herein.
2. Between, on or about November 18, 2014, and on or about September 1, 2015, in the Eastern District of Missouri, and elsewhere,

Marc A. Manzo,

the defendant herein, did knowingly possess material that contains an image and video of child pornography that was produced using materials that traveled in interstate and foreign commerce, to wit, CDs and DVDs that were produced outside of Missouri and therefore has traveled in interstate and foreign commerce, and said CDs and DVDs contained child pornography, including but not limited to the following:

- 1) "01013938.AVI" – a graphic video file depicting a prepubescent minor female performing oral sex on a male;
- 2) "05yrbuttfuckSally 11S!.avi" – a graphic video file depicting a prepubescent minor female being penetrated;
- 3) "ohdaddy11.mpg" – a graphic video file depicting prepubescent minor female having sex with a male;
- 4) "100_2740a.avi" – graphic image file depicting a prepubescent minor female touching a male's penis.

In violation of Title 18, United States Code, Section 2252A(a)(5)(B).

A TRUE BILL.

FOREPERSON

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